

## **Exhibit C**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUPAN CHAKMA, SULOY TRIPORA, TAPAN  
KANTI TANCHANGYA, TIYANIT KAEWPAN,  
and PRAMITA CHAKMA, on behalf of themselves  
and others similarly situated

Plaintiffs,

v.

23-cv-08704 (KPF)

SUSHI KATSUEI, INC. d/b/a SUSHI KATSUEI  
PARK SLOPE, ROYAL KATSUEI, INC. d/b/a  
SUSHI KATSUEI WEST VILLAGE, AYE AYE  
SWE, and AUNG KO WIN,

Defendants.

**DECLARATION OF BINOY CHAKMA**

I, Binoy Chakma, under penalty of perjury, declare as follows:

1. I was formerly employed by Sushi Katsuei restaurant. I am familiar with the facts and circumstances set forth herein.

2. On June 10, 2025, a manager at Sushi Katsuei met with me in my apartment in Albany, NY where she gave me two gift cards and asked me to exclude myself from the lawsuit.

3. I worked as a server at Sushi Katsuei in Brooklyn from approximately March 2022 until April 2023.

4. When I worked at Sushi Katsuei, I lived in Queens, NY.

5. Shortly after I stopped working at Sushi Katsuei, I moved to Albany, NY.

6. When I worked at Sushi Katsuei, my manager was a woman we referred to in the restaurant as “Maya” or “Maya San.”

7. When I worked at the restaurant, Maya had my phone number and she would text me about my schedule and other issues at the restaurant.

8. Until earlier this month, I had not spoken to Maya since I stopped working at the restaurant.

9. To the best of my knowledge, when I worked with her, Maya lived in the New York City area, not in Albany.

10. On June 7, 2025, Maya called me and asked if she could meet with me. I did not know what the meeting was about but we agreed that she would come to my home in Albany on June 10, 2025.

11. On June 10<sup>th</sup>, Maya met with me in my apartment. She told me that she had driven up to my apartment from New York City to meet me.

12. During the meeting she informed me that I was included in a class action against Sushi Katsuei restaurant.

13. Prior to meeting with Maya, I knew that there was a case pending against the restaurant but I did not know that I was included in the class of employees in the case.

14. In other words, Maya was the first person to inform me that I was a class member in the case.

15. I later found out that a notice about a class action was sent to me but it was sent to the address I had in Queens during the time I worked at Sushi Katsuei.

16. In our meeting, Maya informed me that the reason she had come all the way up to Albany was to ask me to exclude myself from the class action.

17. Maya spoke very disparagingly about the Plaintiffs in the case. For example, Maya said that some of the plaintiffs gave her a very hard time at the restaurant.

18. Maya asked me to “do her a favor” and write that I had only been working at Sushi Katsuei for one year, that I was happy with the way my employers treated me, and that I wanted to be excluded from the case.

19. Maya also asked me to write the address for the attorneys that she would send the note I had written to. Maya provided me with the address.

20. I wrote the things Maya asked me to write and provided the note to her.

21. I did not mail the note myself and I did not even provide a stamp for the mailing. I simply provided the note to Maya with the understanding that she would submit it to the lawyers.

22. My meeting with Maya was short and she pressured me to write this note.

23. I did not have time to think about what the case is about and how much money I might be owed from Sushi Katsuei.

24. I also did not feel like I could refuse Maya.

25. I also did not understand what it meant that I would be excluding myself from the case. Given the short time in which Maya and I spoke and the pressure Maya put on me, I did not feel like I could refuse Maya and so I wrote the note she asked me to.

26. At the time that I signed the note, I did not realize that I was giving up any rights I had in the lawsuit.

27. I now realize that I do want to participate as a class members in this lawsuit.

28. After I signed the note and gave it to Maya, she gave me two gift cards to Macy’s department store. Maya said the cards were from Sushi Katsuei.

29. Yesterday, I was contacted by a former coworker at Sushi Katsuei. He told me that Maya said the note I provided her was not written clearly and that she asked that

I provide a new note seeking to exclude myself. The former coworker further stated that Maya asked him to tell me that once I send a new version to Maya, she will have it mailed.

I declare under penalty of perjury of the law of the United States that the foregoing is true and correct.

6/25/2025

Dated: \_\_\_\_\_

By: \_\_\_\_\_  
Signed by:  
*Binoy Chakma*  
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Binoy Chakma